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[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JANE DOE, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA d/b/a UCSF MEDICAL
CENTER,

Defendants.

Case No. 3:23-cv-00598-WHO

**DECLARATION OF CHRISTIAN LEVIS IN
SUPPORT OF JOINT STIPULATION AND
PROPOSED ORDER EXTENDING THE
CASE SCHEDULE**

1 I, Christian Levis, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of New York and admitted
3 to practice *pro hac vice* in this matter before this Court. I am a partner in the law firm of Lowey
4 Dannenberg, P.C., and counsel of record for the Plaintiff and the proposed Class in the above-
5 captioned action. I have personal knowledge of the facts set forth herein and, if called upon as a
6 witness, I could testify competently under oath thereto.

7 2. Pursuant to Civ. L.R. 6-2, I submit this declaration in support of the Parties' Joint
8 Stipulation and Proposed Order Extending the Case Schedule.

9 3. On August 28, 2024, the Court granted the Parties' request to extend the case schedule
10 by six months in its case management order.

11 4. After this case management order, the Parties have been diligent in conducting
12 discovery, including meeting-and-conferring every three weeks to address outstanding discovery
13 issues. At this time, the Parties anticipate they will need additional time to work on remaining
14 document productions, including some of which involve technical matters like querying databases.
15 This process takes longer than Parties had expected. Additionally, the Parties are currently negotiating
16 30(b)(6) deposition-related matters, including identifying potential topics, witnesses, and their
17 availabilities. Plaintiff also expects to serve supplemental discovery requests based on the information
18 uncovered during the 30(b)(6) depositions, as well as serve additional deposition notices. Given this
19 development, the Parties have met and conferred and agreed that the case schedule should be extended.

20 5. The Parties have previously stipulated, and the Court ordered an extension of time to
21 exchange Initial Disclosures and submit the Rule 26(f) Report (ECF No. 20), an extension of time to
22 file Plaintiff's Amended Complaint and the exchange of Initial Disclosures (ECF No. 30), an extension
23 of time for Regents to answer the Second Amended Complaint (ECF No. 40), an extension of the case
24 schedule by 6 months (ECF No. 53), and another extension of the case schedule by 6 months. ECF
25 No. 70.

26 6. This stipulation will extend the case schedule by 6 months.

27 I declare under penalty of perjury under the laws of the United States of America that the
28

foregoing is true and correct and was executed on February 24, 2025, in White Plains, New York.

Dated: February 24, 2025

By: /s/ Christian Levis
Christian Levis (admitted *pro hac vice*)